

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TURO INC.,

Movant,

v.

AVIS BUDGET GROUP, INC.,

Respondent.

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Misc. Case No. _____

**Related to Civil Action No. 2:18-cv-06055-
CAS (GJSx), pending in the United States
District Court for the Central District of
California**

**PLAINTIFF TURO INC.’S NOTICE OF MOTION AND MOTION TO
COMPEL AVIS BUDGET GROUP INC.’S RESPONSES TO SUBPOENA**

PLEASE TAKE NOTICE that upon the accompanying (i) Memorandum of Law and (ii) Declaration of Ryan T. O'Hollaren, and the exhibits thereto, movant Turo Inc. ("Turo" or "Movant") will move this Court at the United States District Court, 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an Order pursuant to Fed. R. Civ. P. 45, compelling Avis Budget Group, Inc. ("Avis" or "Respondent") to comply with a subpoena issued by Turo in the matter *Turo Inc. v. City of Los Angeles*, No. 2:18-CV-6055 (CAS) (GJSx) (C.D. Cal.) (the "LAX Action"), by producing documents, without objection, by dates certain to be set by the Court, and for such other and further relief as the Court deems just and proper.

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Ryan T. O'Hollaren, dated October 27, 2021, with the exhibits thereto, the record in the LAX Action, the facts of which the Court may take judicial notice, and any other papers submitted in support of the Motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Civil Rule 6.1(b) of this Court, Respondent's opposition papers, if any, shall be served within fourteen days after service of the instant moving papers, and Movant's reply papers, if any, shall be served within seven days after service of Respondent's opposition papers.

Dated: October 27, 2021

COOLEY LLP

By: /s/ Nicholas Flath
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